

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBERT C. ADLER,

Plaintiff,

-against-

PAYWARD, INC. d/b/a KRAKEN,

Defendant.

Case No. 1:18-cv-08100 (PAC) (DCF)

Civil Action

NOTICE OF CROSS-MOTION TO AMEND THE COMPLAINT

PLEASE TAKE NOTICE, that Plaintiff Robert C. Adler, by and through undersigned counsel, shall move to amend Plaintiff's Complaint in the above-captioned matter before the Honorable Paul A. Crotty, United States District Judge, in Courtroom 14C on the return date of the pending motion to Dismiss the Complaint, Motion Number 1, Docket Number 20, at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, to Amend the Complaint as attached at Exhibit B hereto pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure for the reasons set forth in the Memorandum of Law filed herewith, and to make any such further edit as the Court may hold would be required to sustain any cause of action herein.

Dated: New York, New York
February 1, 2019

Marion & Allen, P.C.



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